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BARRETT S. LITT
MICHAEL S. MAGNUSON
CARLA BARBOZA

RECEIVED

AUG 10 1983

Feldsott, Lee & Van Gemert

August 11, 1983

Jolene Young
Feldsott, Lee and Van Gemert
1617 West Cliff Drive, Suite 204
Newport Beach, California 92660

Re: Depositions in the case of Church of Scientology v. Gerald Armstrong, No. C 420 153

Dear Ms. Young:

This office represents Mary Sue Hubbard, plaintiff in intervention in the case noted above. As I believe you are aware, you have been identified by either Gerald or Joyce Armstrong as one of the individuals they have talked to about the above-mentioned case. We are, therefore, interested in taking your deposition at the earliest practicable date. We do not wish, however, to inconvenience you, or the other employees at this office who may also have information relevant to this proceeding. In order to avoid such inconvenience, I would suggest adopting the following procedure: (1) If you contact me by telephone as soon as possible we can discuss informally the substance of your anticipated deposition testimony. On that basis we may conclude that actually taking your deposition will be unnecessary. (2) If your deposition is necessary, I'm willing to schedule it in your office at a mutually convenient time.

I had previously explained to Julia Dragojevic, attorney for Mr. Armstrong, that, in order to avoid any unnecessary inconvenience to you, we were prepared to follow the above procedure. She indicated that no such approach was agreeable to you. Please understand that our proposal is done as a courtesy to you. We are, of course, prepared to proceed by way of deposition. You may feel that you have no place as a witness in this lawsuit, and you may be right. However, we believe it is necessary to pursue information you may have, and we hope you understand why, from our point of view, it is necessary. Obviously, we cannot reach a conclusion on whether you have any pertinent information until we have the opportunity to interview or depose you.

I am sending this identical letter to the following people, including yourself: Michael Walton, Barbara Murray, Stanley Feldsott, and Jolene Young. In the event that it is necessary to

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Ms. Young

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schedule depositions, I would like to set them on the same day. In the event you wish to cooperate in this matter, please try to coordinate among yourselves regarding the dates on which you are available.

I would appreciate a response to this letter either by telephone or in writing within five days of its receipt. If I do not receive such a response, I will schedule these depositions at my convenience and arrange for service of the necessary subpoenas.

I appreciate your courtesy and cooperation regarding this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michael S. Magnuson".

Michael S. Magnuson

MSM:ams

cc: Julia Dragojevic